

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

2011 APR 25 PM 2: 29

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Exhibit P-4

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

KEVIN MARET

Plaintiff

VERSUS

**WORKS CONNECTION, INC.,
PRO CIRCUIT PRODUCTS INC.
TUF RACING PRODUCTS INC.
D/B/A A/K/A UFO PLAST,
DEVOL ENGINEERING, INC.
AND OUTLAW RACING
PRODUCTS, INC. D/B/A A/K/A
PIT-POSSE MOTORSPORTS**

Defendants

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CIVIL ACTION NO. 4:09-CV-3238

SECTION: RGK-JUDGE RICHARD G. KOPF

MAGISTRATE: RGK

**COMPLAINT FOR PATENT
INFRINGEMENT, UNJUST
ENRICHMENT AND CONVERSION**

JURY TRIAL DEMANDED

**JOINT MOTION TO DISMISS AND CONSENT JUDGMENT BETWEEN KEVIN
MARET AND PRO CIRCUIT PRODUCTS INC.**

NOW INTO COURT, through undersigned counsel comes, Plaintiff, **Kevin Maret**,
appearing herein through undersigned counsel and Defendant **Pro Circuit Products, Inc.**,
appearing herein through undersigned counsel, the parties have signed a settlement agreement
and therefore they jointly move that this consent judgment and motion to dismiss be issued, and
that:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED, and as per agreement of the
Parties that Defendant, Pro Circuit Products, Inc. is immediately ordered to cease and desist all

manufacturing and production of its Pro Circuit Products, Inc. “Launch Control” holeshot devices by itself or its agents immediately as of March 6, 2011.

IT IS FURTHER HEREBY ORDERED, ADJUDGED AND DECREED, and Pro Circuit Products, Inc. is ordered by October 31, 2011, to cease and desist of all manufacturing, production, sales, promotion and giveaways to any motorcross race teams and customers in the U.S.A. of any of its Pro Circuit Launch Control” pin-style holeshot devices but Pro Circuit Products, Inc. may sell existing inventory thru its store, motorcycle dealers, thru its own website only of its existing inventory of 2,284 “Launch Control” holeshot devices until October 31, 2011, in order to liquidate Pro Circuit Products, Inc.’s existing inventory as per the settlement agreement between the parties filed under seal herein at Exhibit marked “CONFIDENTIAL SETTLEMENT AGREEMENT”.

IT IS FURTHER HEREBY ORDERED, ADJUDGED AND DECREED, that Defendant, Pro Circuit Products, Inc.. after October 31, 2011 is enjoined and a permanent injunction is hereby issued without bond, prohibiting Pro Circuit Products, Inc. from selling, advertising, manufacturing, promoting, giving away or distributing Pro Circuit Products, Inc. “Launch Control” pin-style holeshot devices now or in the future in the U.S.A. Notwithstanding these provisions and pursuant to the “CONFIDENTIAL SETTLEMENT AGREEMENT”, Pro Circuit, Inc. is permitted to keep a supply of parts for its “Launch Control” pin-style holeshot devices for warrenty and repair, until October 31, 2012.

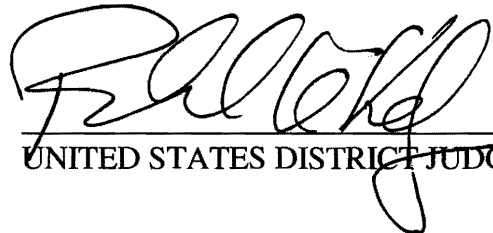
IT IS FURTHER HEREBY ORDERED, ADJUDGED AND DECREED, that this Court shall retain jurisdiction over the enforcement of this Consent Judgment, and the parties’

confidential settlement agreement; and

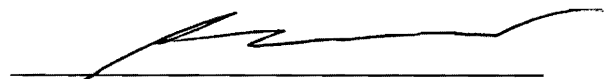
IT IS FURTHER AGREED by the parties have executed a joint release and settlement agreement marked as "CONFIDENTIAL SETTLEMENT AGREEMENT" which is filed under seal with the court and is confidential and therefore;

IT IS ORDERED that the claims and counter-claims of Kevin Maret and Pro Circuit Products, Inc. are hereby dismissed with prejudice with each party to bear its own costs with Kevin Maret expressly reserving all rights against all other defendants, including Works Connection Inc.

Lincoln, Nebraska, this 25 day of April, ~~2010~~ ^{2011 R61-}


UNITED STATES DISTRICT JUDGE


AGREED TO:



Glenn C. McGovern (La. Bar #9321)
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**ATTORNEY FOR PLAINTIFF,
KEVIN MARET**

And



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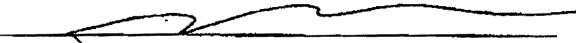
Email:

ATTORNEY FOR DEFENDANT,

Pro Circuit Products, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have filed the above Consent Judgment electronically with the Clerk of Court by suing CM/ECF System, and a copy has been forwarded to all parties via U.S. First Class mail, postage prepaid and properly addressed on this 4 day of April, 2010.



Glenn C. McGovern, Attorney for Kevin Maret